



16594
Solutia Inc.
575 Maryville Centre Drive
St. Louis, Missouri 63141

P.O. Box 66760
St. Louis, Missouri 63166-6760
Tel/ 314-674-1000

March 30, 2001

Kevin Turner-Environmental Scientist, OSC (3 copies)
U. S. Environmental Protection Agency
8588 Rt. 148
Marion, IL 62959

**Re: Sauget Sites Area I - May 31, 2000 Unilateral Administrative Order
Docket No. V-W-99-C-554
Dead Creek Sediments & Soils Removal / Containment**

- **Time Critical Removal Action Work Plan**
- **Revised Appendix D, "Containment Cell Design Report"**

Dear Mr. Turner,

On May 31, 2000 the United States Environmental Protection Agency ("U. S. EPA") issued a Unilateral Administrative Order ("Order") to Monsanto Company and Solutia Inc. ("Solutia") requiring removal of soils and sediments from Dead Creek and placement within a containment cell. On June 30, 2000 Solutia submitted for U. S. EPA's approval, a Time Critical Removal Action Work Plan ("TCRAWP") pursuant to the Order and containing a draft "Containment Cell Design Report" as Appendix D to the TCRAWP.

The U.S. EPA, Illinois EPA, Illinois DNR and U.S. Fish and Wildlife Service ("Agencies") have reviewed the TCRAWP submittal. After a series of Comments from the Agencies, discussion meetings and Responses to Comments by Solutia, the Agencies and Solutia came to resolution on all of the Agencies' comments. On March 5, 2001, conditional approval of the TCRAWP and containment cell design was received from the U. S. EPA. The approval was subject to the Agencies' concurrence that the final TCRAWP Containment Cell Design Report accurately incorporated all of the agreements generated by the Comments / Response-to-Comments process. It is Solutia's intent and belief that this submittal of the revised Appendix D, "Containment Cell Design Report" to the June 30, 2001 TCRAWP, incorporates all agreed-to modifications and additions to the containment cell design.

On the basis of the conditional March 5, 2001 U. S. EPA approval of the TCRAWP and containment cell design and in the interest of a timely and cost effective response, Solutia has in good faith let a contract for construction of the cell. The selected contractor is presently setting up site operations and mobilizing equipment and manpower to the field in anticipation of the Agencies' final approval of the TCRAWP. Construction of the cell will begin immediately upon receipt of final approval.

Solutia appreciates your prompt review and receipt of final approval. As we have discussed, it is critical from both a cost and schedule standpoint that construction of the cell begin without delay in order to fully utilize the 2001 construction season.

Sincerely,



D. M. Light
Project Coordinator
Solutia Inc.

cc: (w/enclosure)

Robert Watson - IEPA
Linda Tape, Esq. - Thompson Coburn
Mike Henry - IDNR
Kevin de la Bruere - U.S. F&WS

cc: (w/o enclosure)

Thomas Martin, Esq. - USEPA
Michael McAteer - USEPA

U.S. ENVIRONMENTAL
PROTECTION AGENCY

APR 6 2 2001

OFFICE OF REGIONAL
COUNSEL